

Dear FCC,

I am sorry to see comments here that appear to be the result of an organized group with predefined opinions regarding 02-98. Many of those comments are not consistent with logic. My comments are my own and are the result of over 44 years experience as a licensed amateur.

1) The proposed 60 meter amateur band should NOT be divided into subbands, subbands being divisions of the proposed band being allocated by mode. In fact, all other amateur bands should have subband allocations removed!

As operating modes come and go in popularity, much of the space becomes underutilized. The CW mode is a good example. There are large chunks of our bands allocated to CW operation only. As technology has advanced and PHONE operation has become more popular, much of the spectrum allocated to exclusive CW operation goes unused or underused and the PHONE portions of the amateur bands have become overcrowded. There can be no dispute of my claim because it can be verified by simply listening to the lack of activity in the CW subbands and the crowding of the PHONE bands.

Additionally, the 60 meter band is noted to be shared with other services. Creating subbands would make it more difficult to change frequencies to avoid interference with those other services.

Please allow the amateur service determine the most efficient way to use the proposed band. We are one of the few countries that divide our amateur bands by mode and we should examine that action.

Regards,  
Larry Robison W9MDX